

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

<b>STATE OF ARIZONA, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 6:22-cv-1130</b>
	)	
<b>MERRICK GARLAND, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

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**JOINT MOTION FOR EXTENSION OF TIME  
TO COMPLETE DISCOVERY**

The parties respectfully request an extension of time to complete the remaining jurisdictional discovery in this case. Specifically, the parties request a 30-day extension of time, from August 25 to September 25, 2023 to exchange expert reports, and an extension from September 15 to November 8, 2023 for Defendants to file a Rule 12 motion. ECF No. 183. This schedule will allow the parties time to complete depositions in this matter. Although the Court has not set a specific deadline for the parties to complete depositions, the parties aim to complete depositions by October 25, two weeks before Defendants Rule 12 motions would be due under this proposed schedule.

By way of background, the parties attended a conference on May 24, 2023 to discuss their respective motions to compel and outstanding discovery. ECF No. 170. Following that conference, the parties exchanged Court ordered discovery and conferred about outstanding issues. With most of those issues resolved and responsive data produced, on August 18, 2023, Defendants served 30(b)(6) deposition notices on Plaintiffs. In the deposition notices, Defendants did not select specific dates to allow Plaintiffs to first select witnesses and obtain their schedules, and then the

parties will confer on mutually agreeable dates for the depositions. This extension will allow the parties the opportunity to do that and conduct the depositions. This extension will also permit the parties time to conduct depositions of expert witnesses, if necessary.

Therefore, the parties request that the Court grant an extension of time and enter the following schedule: parties to exchange expert reports by September 25, 2023; parties to complete depositions by October 25, 2023; Defendants to file any Rule 12 motion by November 8, 2023.

Date: August 23, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 23, 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which provided an electronic notice and electronic link of the same to all attorneys of record.

By: /s/ Erin T. Ryan

ERIN T. RYAN

Trial Attorney

United States Department of Justice

Civil Division